



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

LAUREN JEANETTE DIGGS,

Defendant

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CRIMINAL NO.

**(Conspiracy, 18 U.S.C. § 371; Witness
Tampering, 18 U.S.C. § 1512; False
Declarations Before Grand Jury,
18 U.S.C. § 1623; Forfeiture, 18 U.S.C.
§ 981(a)(1)(c) and 28 U.S.C. § 2461(c))**

INDICTMENT

**COUNT ONE
(Conspiracy)**

The Grand Jury for the District of Maryland charges that:

Individuals and Entities

At all times relevant to this Indictment:

1. Clean and Sober, LLC and Alcohol and Drug Recovery were Maryland entities that operated collectively as ADR, a provider of alcohol and drug treatment services in Forestville, Annapolis, Glen Burnie, and Waldorf, Maryland.

2. The United States Probation and Pretrial Services System was a component of the Administrative Office of the United States Courts, whose mission was to investigate and supervise persons who had been charged with federal crimes and released from detention pending further proceedings (“pretrial release”), had been convicted of crimes and released by the Bureau of Prisons after a period of incarceration (“supervised release”) or paroled by the United States Parole Commission from a prison sentence, or had been placed on probation. In

Maryland, these functions were performed by U.S. Probation and Pretrial Services (“U.S. Probation”), a component of the United States District Court for the District of Maryland (“the U.S. District Court”). Among U.S. Probation’s duties were to gather and verify information about persons who came before the U.S. District Court, prepare reports that the U.S. District Court relied upon to make release and sentencing decisions, supervise persons released to the community by the U.S. District Court or corrections officials, and direct persons under supervision to services to help them avoid violating the law, including substance abuse treatment, mental health treatment, medical care, training, and employment assistance.

3. Between on or about July 27, 2009 and on or about December 30, 2010, defendant **LAUREN JEANETTE DIGGS** was a resident of Maryland and was employed by ADR as a Senior Counselor.

4. As part of her official duties, defendant **DIGGS** was the primary alcohol and substance abuse counselor for ADR’s Forestville facility, where she also supervised urine tests on female clients.

5. **Christopher Womack (“Womack”)** was a resident of Maryland and employed by ADR as an administrative assistant and urine technician at the Forestville facility.

6. As part of his official duties, **Womack** was required to administer urine tests, accurately maintain records of the client’s name and the date and result of the urine test, and notify U.S. Probation if a client’s urine tested positive for the presence of a controlled substance or if a client failed to provide a urine specimen.

7. By virtue of their employment with ADR acting under and by authority of U.S. Probation, defendant **DIGGS** and **Womack** were “public officials” whose actions constituted

“official acts” as defined in Title 18, United States Code, Section 201(a).

Federal Supervision Contract

8. U.S. Probation contracted with ADR to provide a variety of services, including testing the urine samples of individuals who were on pretrial release, supervised release, parole or probation (“the ADR clients”) for the presence of controlled substances. In conducting the urine testing for ADR clients, ADR urine technicians were responsible for retrieving the testing containers from a secure location, escorting the ADR client to the bathroom, observing the ADR client urinate into the container, retrieving the container, and then testing the urine sample for the presence of controlled substances. The ADR urine technician recorded, among other information, the date and time of the urine test, whether the ADR client completed the test, and the result. ADR then submitted those results to U.S. Probation. When ADR clients completed ADR’s substance abuse and mental health treatment programs, ADR provided them with Discharge Summary Certificates. U.S. Probation relied on the urine test results and the Discharge Summary Certificates to inform the U.S. District Court or the Parole Commission for their use in supervising individuals charged with or convicted of federal crimes.

9. Client Two was a client of ADR at the ADR facility in Forestville, Maryland who was under supervision by U.S. Probation. Client Three was a potential client of ADR who was not under supervision by U.S. Probation.

The Conspiracy and its Objects

10. Between in or about January 2010 and in or about February 2012, in the District of Maryland and elsewhere, the defendant,

LAUREN JEANETTE DIGGS,

did knowingly conspire, confederate and agree with **Christopher Womack** and other persons known and unknown to the Grand Jury to commit an offense against the United States, that is, being public officials, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept something of value, that is money from ADR clients, in return for being influenced in the performance of an official act, being influenced to commit and aid in committing and to collude in, and allow and to make opportunity for the commission of a fraud on the United States, and induced to do an act and omit to do an act in violation of their official duties, in violation of 18 U.S.C. § 201(b).

The Manner and Means of the Conspiracy

11. It was a part of the conspiracy that defendant **DIGGS, Womack**, and others demanded, sought, and received money from ADR clients and potential clients.

12. It was further a part of the conspiracy that in exchange for money from ADR clients, defendant **DIGGS, Womack**, and other public officials took and agreed not to take official action for the benefit of ADR clients, including performing and not performing court-mandated drug testing, and providing fictitious certificates.

13. It was further a part of the conspiracy that after her employment with ADR ended, defendant **DIGGS** continued to work with **Womack** to provide fictitious certificates to ADR clients in exchange for money, and received proceeds of bribe payments from **Womack**.

Overt Acts

14. In furtherance of the conspiracy and to achieve its purposes, defendant **DIGGS**, **Womack**, and their co-conspirators committed the following overt acts, among others, in the District of Maryland and elsewhere:

a. In or about January 2010, defendant **DIGGS** asked **Womack** to ensure that certain ADR clients under supervision would not have their urine samples accurately tested and reported to U.S. Probation in exchange for money from ADR clients.

b. In or about January 2010, defendant **DIGGS** introduced **Womack** to her bribe-paying clients and explained her bribe pricing schedule to **Womack**.

c. In or about May 2011, **Womack** accepted U.S. currency from Client Two in exchange for using his official position as a urine technician to ensure that Client Two did not provide an accurate urine sample and to conceal the lack of a test result from U.S. Probation.

d. In or about January 2012, **Womack** agreed to sell a Discharge Summary Certificate to Client Three in exchange for \$400.

e. In or about January 2012, **Womack** contacted defendant **DIGGS**, who agreed to assist **Womack** in selling the Discharge Summary Certificate to Client Three.

f. In or about January 2012, defendant **DIGGS** provided a Discharge Summary Certificate to Client Three in exchange for \$400.

COUNT TWO
(Witness Tampering)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9, and 11 through 14, of Count One are incorporated here.
2. During 2012, the Grand Jury October 2011 Term of the United States District Court for the District of Maryland, sitting in Greenbelt ("the Grand Jury"), was conducting an investigation to determine whether violations of Title 18, United States Code, Sections 201 and 371, had been committed, and to identify the persons who had committed, caused the commission of, and conspired to commit such violations. Among other things, the Grand Jury was investigating whether defendant **DIGGS** was aware of any ADR employees, including, among others, defendant **DIGGS** and **Womack**, receiving money in exchange for not requiring ADR clients to take court-mandated urine tests.
3. In or about June 2012, the Grand Jury issued subpoenas requiring defendant **DIGGS** and **Womack** to appear before the Grand Jury and to provide sworn testimony.
4. On or about June 11, 2012, at approximately 10:04 a.m., **Womack** called defendant **DIGGS** and discussed **Womack's** and defendant **DIGGS's** anticipated testimony before the Grand Jury, as described below:

Womack: Now look I got a question for ya.

DIGGS: What?

Womack: Hey, did you get a subpoena from the federal court?

DIGGS: Yeah. I think so

Womack: Yeah; 'cause you know, check this out, after they came past my place last night, you know? They gave me a grand jury subpoena. You know.

* * * *

Womack: Well, well what, what should I do? You know, they talking about the urines and they started talking about the, I mean, watch you, what should I do?

DIGGS: Tell them you only took urine, and you didn't take no money for it!

Womack: Tell them I only took urine. I didn't take no money for it?

DIGGS: Yeah, you didn't fucking, you didn't, you didn't give them urine in place of your urine or nothing like that, and you wasn't taking no money, and you don't know nothing about it, and you don't know nothing about me. As far as you concerned is, I did my job. I was the counselor.

Womack: mmm hmm, mmm hmm.

DIGGS: That's it.

Womack: But, but they already know . . .

DIGGS: . . . and I'm going to argue to them I don't know anybody that could of [sic] forged my name. I don't know nothing about it. I didn't step foot in any jail once I got fired.

Womack: mmm hmm, mmm hmm.

DIGGS: That's gonna be my fucking story.

* * * *

Womack: Okay. But you, you did get the subpoena?

DIGGS: I got a subpoena for the grand jury. Yes!

Womack: Okay and what if they ask you. . . .

DIGGS: . . . but I didn't go, they told it was the fourth.

Womack: Oh, well if they ask you any questions about me, what you gonna say?

DIGGS: I'm gonna say you were, you was urine tech.

Womack: And that's it.

DIGGS: That's it!

Womack: Oh, okay. Okay, I feel you.

DIGGS: That's it! There ain't nothing else to fucking tell the mother fuckers!

Womack: mmm hmm

DIGGS: They have no fucking proof. I don't give a fuck if they got something with my name on it. I don't care.

* * * *

Womack: Okay. Alright. Did . . . I'm just trying to make sure I got everything straight.

DIGGS: You don't know shit. Deny! Deny! Deny!

Womack: Okay.

DIGGS: If you don't remember no other fucking word you remember that god dammit word. Deny!

Womack: Deny . . . Okay . . . Cool.

DIGGS: Deny everything.

Womack: Okay.

DIGGS: 'Cause that's what the fuck I'm gonna do.

Womack: Okay.

DIGGS: They're gonna try to come against me.

Womack: Okay.

DIGGS: Don't do it Chris.

Womack: Okay.

DIGGS: 'Cause I'm not, I'm not putting you on nothing either.

Womack: Right. Well you want me to call you after I go to the grand jury?

DIGGS: When are you going?

Womack: Uh, Monday the 18th.

DIGGS: Alright, call me.

Womack: And, I'll tell you what you call me when you go, so that I know what they say.

The Charge

5. On or about June 11, 2012, in the District of Maryland, the defendant,

LAUREN JEANETTE DIGGS,

attempted to corruptly persuade another person with intent to influence the testimony of any person in an official proceeding, to wit, defendant **DIGGS** attempted to persuade **Christopher Womack** to testify falsely before the Grand Jury October 2011 Term, a grand jury of the United States District Court for the District of Maryland.

18 U.S.C. § 1512(b)(1)

18 U.S.C. § 2

COUNT THREE
(False Declarations to Grand Jury)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9, and 11 through 14, of Count One, and paragraphs 2 through 4 of Count Two, are incorporated here.

2. On or about July 2, 2012, defendant **DIGGS** testified under oath before the Grand Jury.

3. It was material to the Grand Jury's investigation to ascertain if defendant **DIGGS** was aware whether any ADR employees, including defendant **DIGGS** and **Womack**, received money in exchange for not requiring ADR clients to take court-mandated urine tests.

4. On or about July 2, 2012, in the District of Maryland, the defendant,

LAUREN JEANETTE DIGGS,

while under oath and testifying in a proceeding before the Grand Jury October 2011 Term, a grand jury of the United States District Court for the District of Maryland, knowingly made false material declarations as underscored below, namely:

Q: Ms. Diggs, are you aware of anybody at ADR receiving money in exchange for not making the offender take the urine test?

A: **No.**

Q: To your knowledge, has any employee of ADR ever accepted a bribe or currency from an offender?

A: **No.**

* * * *

Q: Has Chris Womack ever received money from an offender to do something that's improper?

A: No.

Q: So we're all on the same page, if someone such as Chris or yourself or John or anybody else at ADR took money from an offender to do that - - meaning not make the person take the test and then write information in the log or paperwork that's not true, that would be improper, right?

A: Yes.

Q: To your know knowledge, has anybody at ADR ever done that, what I just described to you?

A: Not to my knowledge.

5. Defendant **DIGGS** knew this testimony was false, in that she and **Womack** had both accepted bribe payments from ADR clients in return for not conducting court-ordered urine tests and writing untrue information in ADR records.

18 U.S.C. § 1623

COUNT FOUR
(False Declarations to Grand Jury)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9, and 11 through 14, of Count One, paragraphs 2 through 4 of Count Two, and paragraph 2 of Count Three are incorporated here.

2. It was material to the Grand Jury's investigation to ascertain whether defendant **DIGGS** was aware of any ADR employees, including, among others, defendant **DIGGS** and Womack, providing ADR Discharge Summary Certificates to ADR clients in return for money without requiring the ADR clients to complete the prerequisite and court-ordered substance abuse and mental health treatment programs.

3. On or about July 2, 2012, in the District of Maryland, the defendant,

LAUREN JEANETTE DIGGS,

while under oath and testifying in a proceeding before the Grand Jury October 2011 Term, a grand jury of the United States District Court for the District of Maryland, knowingly made false material declarations as underscored below, namely:

Q: Okay. Are you familiar with what's known as a Discharge Summary Document? The certificates where offenders who have finished their counseling, they fill those out.

A: Yes.

Q: Okay. You were a counselor, right?

A: Yes.

Q: To your knowledge, did anybody at ADR or associated with ADR ever sell one of those documents to an offender?

A: No.

Q: Have you heard of the name [Client Three]?

A: No.

Q: You've never heard the name before?

A: No. I mean, there's a lot of clients.

Q: I know. And I'm not even saying that this person is a client, I'm just saying have you heard that name [Client Three]?

A: No.

Q: Have you ever heard anybody mention the name [Client Three] to you?

A: No.

* * * *

Q: Has Chris [**Womack**] ever discussed the name with you - - [Client Three]?

A: No.

5. Defendant **DIGGS** knew this testimony was false, in that she and **Womack** had met with Client Three in January 2012 and in return for money had provided him with a Discharge Summary Certificate, certifying that Client Three had completed counseling provided by ADR, and she and **Womack** had discussed Client Three on June 11, 2012.

18 U.S.C. § 1623

COUNT FIVE
(False Declarations to Grand Jury)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9, and 11 through 14, of Count One, paragraphs 2 through 4 of Count Two, and paragraph 2 of Count Three are incorporated here.

2. It was material to the Grand Jury's investigation to ascertain whether defendant **DIGGS** had spoken to any ADR employees since her employment had been terminated on December 30, 2010.

3. On or about July 2, 2012, in the District of Maryland, the defendant,

LAUREN JEANETTE DIGGS,

while under oath and testifying in a proceeding before the Grand Jury October 2011 Term, a grand jury of the United States District Court for in the District of Maryland, knowingly made false material declarations as underscored below, namely:

Q: When was the last time you spoke to Chris [Womack]?

A: **When I was fired.**

Q: Have you spoken to Chris [Womack] since you were fired?

A: **No.**

5. Defendant **DIGGS** knew this testimony was false, in that she and Womack had spoken on June 11, 2012 about, among other things, the grand jury investigation into ADR.

COUNT SIX
(Witness Tampering)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 9, and 11 through 14, of Count One, paragraphs 2 through 4 of Count Two, and paragraph 2 of Count Three are incorporated here.

2. On or about July 5, 2012, at approximately 2:17 p.m., **Womack** called defendant **DIGGS** and discussed **Womack's** and defendant **DIGGS's** testimony before the Grand Jury, as described below:

DIGGS: No. . . Yo, that grand jury is nothing.

Womack: Yeah 'cause I. . . .

DIGGS: It's nothing. It's easy. Deny it. Deny everything. You haven't seen me, nothing.

Womack: Yeah, 'cause I got your message you left on Monday. I've just been working getting some rest. You know, working a lot so that's why I didn't call you back.

DIGGS: It's easy. It's easy. It's nothing. . . it's non-threatening, it's nothing.

* * * *

DIGGS: They asked me about um, um, they asked me about um, um, let me see . . . anything about him. They asked me about things about him. They um, they didn't ask me did I signed the certificate for him or nothing. I said, "No."

Womack: Oh. Okay.

DIGGS: They asked me, did I sign an exit for him? and I said . . . They didn't ask me did I sign anything for him. You know what I'm saying. They asked me, did I give you anything, any forms or anything? And I said "No".

Womack: Okay. 'Cause my attorney said I gonna get into a lot of trouble if I lie.

DIGGS: What?

Womack: My attorney told me I can get into a lot of trouble if I lie, so what should I say? Do you want me to lie or what?

DIGGS: I'm telling you when you hear the questions that this man gonna throw at you, just say no.

Womack: So you want me just to lie then?

DIGGS: Huh?

Womack: You just, you want me to lie or. . . ?

DIGGS: Huh?

Womack: So you saying you want me to lie or what you want me to do?

DIGGS: Say no!

Womack: Say no?

DIGGS: No!

Womack: So that's, that? Okay. Okay. So, um did they ask um anything about Keith Edwards or any other guys from the um, that was USPO that took money from?

DIGGS: Son no. They asked me if any money exchanged for any favors with USPO and I said, 'No.'

Womack: Oh. Okay. You don't think someone rolled on us or talking about us for taking money do you?

DIGGS: They said, 'There's allegations that ADR took money.' That's why there investigating. I said, 'Okay.' 'Cause I asked you, what is the problem? You know, why are we doing this?

Womack: Uh-huh.

DIGGS: And they asked me, do I still want to testify? I didn't have to testify. I still testified. You understand what I'm saying?

Womack: Right. So what did you tell them about the money we took?

DIGGS: They asked me, 'Was any money exchanged with you and . . . ' and I told them, 'No.'

Womack: Oh. You told them no? Okay.

DIGGS: No! Chris what is your problem though? What problem are you having?

Womack: Alright. I got you now. Just wanna make sure we on the same page you know?

DIGGS: Well you not acting like you on the same page.

Womack: I got you now. Okay. I didn't know what you; I wasn't there with you, so I don't know what you told them. You know?

DIGGS: No! No! No! No!

Womack: Okay.

DIGGS: Everything's no.

Womack: Okay.

DIGGS: Don't fuck up Chris.

Womack: Alright. So they had? --

DIGGS: I'm not trying to go to jail.

Womack: I understand. Me neither.

DIGGS: You not acting like you on the same page.

Womack: I got you. I just want -- look when I, 'cause I got to go to court on the 9th. Okay?

DIGGS: Everything is no Chris.

Womack: I understand that. I understand that, but the -

DIGGS: Oh my god.

Womack: Listen to. . .

DIGGS: You gonna fuck up.

Womack: Lauren listen to me, listen to me, okay? I go to court on the 9th with my attorney, okay? I gotta make sure my story matches your story. You understand? That's why I'm asking –

DIGGS: Everything is no Chris.

Womack: I understand you saying, you saying deny, deny, deny. You're saying, no. I just wanna make sure case they ask me the same questions they ask you. You know?

DIGGS: They gonna ask you the same questions Chris.

Womack: So, I just got one last thing to ask you, okay?

DIGGS: What?

Womack: They didn't say any specifics about the money at all?

DIGGS: They asked me questions about money.

Womack: Okay.

DIGGS: You still say no Chris!

Womack: Gotcha. Alright. I just wanted to know. Uh, you know I got you. So you saying you know I – just basically just – you saying just deny everything?

DIGGS: Deny anything. Anything that's asked, deny. No. No. No. No.

The Charge

3. On or about July 5, 2012, in the District of Maryland, the defendant

LAUREN JEANETTE DIGGS,

attempted to corruptly persuade another person with intent to influence the testimony of any person in an official proceeding, to wit, defendant **DIGGS** attempted to persuade **Christopher**

Womack to testify falsely before the Grand Jury October 2011 Term, a grand jury of the United States in the District of Maryland.

18 U.S.C. § 1512(b)(1)
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section 2461(c), as a result of the defendant's conviction under the Indictment.

2. As a result of the offense set forth in Count One of the Indictment, the defendant,

LAUREN JEANETTE DIGGS,

shall forfeit to the United States, all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, the following:

- a. Personal and real property, including vehicles and U.S. currency;
- b. \$15,000 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained, directly or indirectly, as a result of such violation; and

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of any defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property, that is, \$15,000.

18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

Foreperson

Date